

[Attorney list on signature page]

E-FILED - 9/12/07

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX
SEMICONDUCTOR AMERICA, INC.;
HYNIX SEMICONDUCTOR U.K. LTD.; and
HYNIX SEMICONDUCTOR
DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO. C 00-20905 RMW

**JOINT STIPULATION AND []
ORDER REGARDING HEARING DATES**

RAMBUS INC.,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., HYNIX
SEMICONDUCTOR AMERICA INC.,
HYNIX SEMICONDUCTOR
MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., SAMSUNG SEMICONDUCTOR,
INC., SAMSUNG AUSTIN
SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION,
NANCY TECHNOLOGY CORPORATION
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

1 RAMBUS INC.,

CASE NO. C 05-02298 RMW

2 Plaintiff,

3 vs.

4 SAMSUNG ELECTRONICS CO., LTD.,
5 SAMSUNG ELECTRONICS AMERICA,
6 INC., SAMSUNG SEMICONDUCTOR,
7 INC., SAMSUNG AUSTIN
SEMICONDUCTOR, L.P.,

8 Defendants.

9 RAMBUS INC.,

CASE NO. C 06-00244 RMW

10 Plaintiff,

11 vs.

12 MICRON TECHNOLOGY, INC., and
13 MICRON SEMICONDUCTOR PRODUCTS,
INC.,

14 Defendants.

Pursuant to the Joint Case Management Conference of August 3, 2007 and the Joint Case Management Order of August 30, 2007, ¶ 14, Micron Technology, Inc., Micron Semiconductor Products, Inc., Hynix Semiconductor, Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd., Hynix Semiconductor Deutschland, GmbH, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya Technology Corporation and Nanya Technology Corporation USA (collectively, "the Manufacturers") and Rambus Inc., hereby submit the following joint stipulation and proposed order:

WHEREAS, the Manufacturers have submitted the following outstanding motions to strike:

- "Motion to Strike, or, In The Alternative, Stay Rambus's Infringement Counterclaims In Reply, And Memorandum of Points And Authorities In Support Thereof," filed by Micron Technology, Inc. and Micron Semiconductor Products, Inc., C 06-00244, Dkt. No. 116 (Jul. 30, 2007),
- "Motion to Strike Rambus's Counterclaims In Reply or Alternatively, For More Definite Statement, And Memorandum of Points and Authorities in Support," filed by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P., C 05-02298, Dkt No. 180 (Aug. 2, 2007);
- "Motion to Strike / Samsung's Motion to Strike Rambus's Counterclaims In Reply or Alternatively, For More Definite Statement, And Memorandum of Points and Authorities in Support," filed by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P., C 05-00334, Dkt. No. 296 (Aug. 2, 2007);
- "Notice Of Motion And Motion Of Hynix To Strike Rambus's Second, Fourth, Fifth, Sixth, Seventh, Ninth, Eleventh, Twelfth, Thirteenth, Fifteenth, Sixteenth And Nineteenth Affirmative Defenses Or In The Alternative Request For Additional Discovery: Memorandum Of Points And Authorities," filed by Hynix Semiconductor Manufacturing America Inc., Hynix Semiconductor Deutschland GmbH, Hynix Semiconductor U.K. LTD, Hynix Semiconductor Inc., and Hynix Semiconductor America Inc., C 05-00334, Dkt. No. 290 (Jul. 30, 2007);
- "Notice of Motion, Motion to Strike Counterclaims in Reply and Supplemental Preliminary Infringement Contentions, and Memorandum of Points and Authorities in Support Thereof," filed by Nanya Technology Corporation and Nanya Technology Corporation U.S.A., C 05-00334, Dkt. No. 298 (Aug. 2, 2007);

WHEREAS, these outstanding motions were originally noticed for September 21, 2007;

1 WHEREAS, Rambus requested that the September 21, 2007 hearing date be moved
2 into October 2007 and the parties agreed on an October 26, 2007 hearing date and a briefing
3 schedule as set forth below;

4 WHEREAS, the parties agree that October 26, 2007 should be an additional
5 regularly scheduled conference and motion day pursuant to Paragraph 8(a) of the Case
6 Management Order;

7 THEREFORE, IT IS ORDERED THAT:

8 (1) October 26, 2007 at a time to be determined shall be another regularly
9 scheduled conference and "motion day" in the above-captioned cases to supplement the existing
10 dates in Paragraph 8(a) of the April 24, 2007 Case Management Order;

11 (2) For the previously filed motions listed above, Rambus's opposition papers
12 shall be filed on September 25, 2007 and the Manufacturers' reply papers shall be filed on October
13 12, 2007;

14 (3) For any additional motions to be heard on October 26, 2007, including but
15 not limited to Rambus's motion to strike the Manufacturers' jury demands, the dates for filing
16 motions, oppositions, and replies shall be as provided in Northern District of California Local
17 Rule 7.

18
19 SO ORDERED,

20 DATED: 9/10/07
21 _____



22 HON. RONALD M. WHYTE
23
24
25
26
27
28

1 ON BEHALF OF MANUFACTURERS:

2 DATED: August 31, 2007

Respectfully submitted,

3
4 By /s/ Robert Becher

5 Harold A. Barza

6 William Price

7 Jon Steiger

8 Robert Becher

9 QUINN EMANUEL URQUHART OLIVER &
10 HEDGES

11 865 South Figueroa Street, 10th Floor

12 Los Angeles, California 90017-2543

13 Matthew D. Powers

14 Jared Bobrow

15 John D. Beynon

16 WEIL, GOTSHAL & MANGES LLP

17 Attorneys for

18 MICRON TECHNOLOGY INC., and

19 MICRON SEMICONDUCTOR PRODUCTS,
20 INC.

21 By /s/ Kenneth L. Nissly

22 Kenneth R. O'Rourke

23 O'MELVENY & MYERS LLP

24 Allen Ruby

25 RUBY & SCHOFIELD

26 Kenneth L. Nissly

27 Susan van Keulen

28 Geoffrey H. Yost

THELEN REID BROWN RAYSMAN &

STEINER LLP

Daniel J. Furniss

Theodore Brown, III

Jordan Trent Jones

TOWNSEND and TOWNSEND CREW LLP

Attorneys for

HYNIX SEMICONDUCTOR, INC., HYNIX

SEMICONDUCTOR AMERICA, INC., HYNIX

SEMICONDUCTOR U.K., LTD., and HYNIX

SEMICONDUCTOR DEUTSCHLAND, GmbH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By /s/ David J. Healey

Matthew D. Powers
Edward R. Reines
WEIL, GOTSHAL & MANGES LLP
Redwood Shores, CA 94065

David J. Healey
Anita E. Kadala
WEIL, GOTSHAL & MANGES LLP
Houston, TX 7702

Attorneys for
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

By /s/ Jan Ellen Ellard

Robert E. Freitas
Kai Tseng
Craig Kaufman
Jan Ellen Ellard
ORRICK, HERRINGTON & SUTCLIFFE LLP
Menlo Park, CA 94025

Davin M. Stockwell
Mark J. Shean
ORRICK, HERRINGTON & SUTCLIFFE LLP
Irvine, CA 92514

Attorneys for
NANYA TECHNOLOGY CORPORATION and
NANYA TECHNOLOGY CORPORATION
U.S.A.

1 ON BEHALF OF RAMBUS:
2
3
4
5

6 DATED: August 31, 2007

By /s/ Carolyn Hoecker Luedtke

Gregory P. Stone

Steven M. Perry

Peter A. Detre

Carolyn Hoecker Luedtke

MUNGER, TOLLES & OLSON LLP

Rollin A. Ransom

SIDLEY AUSTIN LLP

Pierre J. Hubert

Craig N. Tolliver

McKOOL SMITH PC

Attorneys for
RAMBUS INC.

1 Filer's Attestation:

2
3 I, Carolyn Hoecker Luedtke, am the ECF user whose identification and password are being
4 used to file this **JOINT STIPULATION AND [PROPOSED] ORDER REGARDING**
5 **HEARING DATES**. In compliance with General Order 45.X.B, I hereby attest that David
6 Healey, Robert Becher, Jan Ellard, and Kenneth Nissly concur in this filing.

7
8 By: /s/_____

9 CAROLYN HOECKER LUEDTKE